

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 04-10493 GAO

MANUEL ROSA
Plaintiff,

v.

CITY OF BOSTON,
Defendant.

JOINT MOTION TO EXTEND FACT DEPOSITION DEADLINE

Now come the parties and respectfully move this Honorable Court, pursuant to Fed. R. Civ. P. 6(b) to extend the fact deposition deadline. As grounds for its motion, the parties state:

1. The fact deposition deadline for this case is June 30, 2005.
2. Defendant's counsel noticed the deposition of the Plaintiff for June 15, 2005, but because of the schedules of counsel, the parties were unable to agree on a date in June 2005.
3. Defendant's counsel is taking another position within the City, and therefore successor counsel will be assigned to this matter before June 29, 2005.
4. The parties request an additional 60-day extension to complete depositions.
5. Allowing this motion will not prejudice any party to the action and will further the interests of justice.

WHEREFORE: The parties respectfully request this Honorable Court allow their motion to extend the fact deposition deadline until August 30, 2005.

Respectfully Submitted,

PLAINTIFF, Manuel Rosa,
By his Attorney,

/s/ Arthur L. Kelly / aea

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DATED: 6/24/05

DEFENDANT, City of Boston,
By its attorney,

/s/ Amy E. Ambarik

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DATED: 6/24/05